

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JANE DOE,)	
)	
Plaintiff,)	
)	
v.)	
)	CIVIL ACTION NO. 3:24-CV-30128
CODY MCCANN, COLLEGE OF OUR)	
LADY OF THE ELMS, TERESA)	
WINTERS, ANDREW COSTON, and)	
PABLO MADERA,)	
)	
Defendants.)	

JOINT STATUS REPORT AND
MOTION TO CANCEL OCTOBER 28, 2025 HEARING

On August 25, 2025, the Court entered by electronic order (Doc. No. 35) (the “Order”) a denial of Defendants College of Our Lady of the Elms, Teresa Winters, Andrew Coston, Pablo Madera (collectively, the “Defendants”) Motion to Dismiss for Failure to State a Claim (Doc. No. 19) and approval of Defendants and Plaintiff Jane Doe’s (“Plaintiff”) (jointly referred to herein as the “Parties”) Joint Motion to Continue Hearing on Defendants’ Motion to Dismiss (Doc. No. 34) to October 28, 2025. Pursuant to that Order, the Parties jointly and respectfully report as follows:

1. The Order also stated that “[i]n the interest of judicial efficiency the pending motion to dismiss is denied without prejudice to refiling should settlement negotiations prove unsuccessful. The parties should file a joint status report regarding the outcome of these negotiations sixty-days from entry of this order.”
2. A Joint Status Report is due to be filed on October 24, 2025.
3. The Parties have been actively engaging in good faith settlement discussions to compromise this matter.

4. The Parties further believe that a settlement of this matter is likely if the parties are provided with an additional sixty (60) days to discuss settlement.

5. No party will be prejudiced by the allowance of this Motion.

6. The Parties further assert that the requested extension will conserve resources of the Parties and the Court.

Therefore, the Parties respectfully request the Court cancel the hearing scheduled for Tuesday, October 28, 2025 at 11:00 AM, given that the Motion to Dismiss is no longer pending, and set a deadline of sixty (60) days from the allowance of this request for the Parties to file a second Joint Status Report.

JANE DOE,
By Her Attorneys,

COLLEGE OF OUR LADY OF THE ELMS,
TERESA WINTERS, ANDREW COSTON, and
PABLO MADERA,
By Their Attorneys,

/s/ Ryan P. McLane (CAV)

Ryan P. McLane (BBO#697464)
McLane & McLane, LLC
269 South Westfield Street
Feeding Hills, MA 01030
Telephone: 413-789-7771
E-mail: ryan@mclanelaw.com

/s/ Chelsie A. Vokes

Chelsie A. Vokes (BBO #699010)
BOWDITCH & DEWEY, LLP
446 Main Street, Suite 1101
Worcester, MA 01608
Telephone: 508-926-3394
Facsimile: 508-929-3031
E-mail: cvokes@bowditch.com

Dated: October 23, 2025

CERTIFICATE OF SERVICE

I certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 23, 2025.

/s/ Chelsie A. Vokes

Chelsie A. Vokes